

**STATE OF MICHIGAN
IN THE EASTERN DISTRICT OF MICHIGAN**

**SHARON CURTIS
Via her guardian and conservator,
JANETTE CURTIS
PLAINTIFFS**

**Case No: 1:23-CV-12859-TLL
Hon: Thomas L. Ludington**

V

**DEUTSCHE BANK NATIONAL TRUST COMPANY,
As Trustee for Quest Trust 2005-X1, Asset Backed
Certificates Series 2005-X1, PHH MORTGAGE CORPORATION
A Foreign limited liability Corp. OCWEN FINANCIAL CORPORATION
A Foreign Limited Liability Corp.
Jointly and severally
DEFENDANTS**

**PLAINTIFF'S REQUEST FOR SECOND ADJOURNMENT DUE TO
COMPLICATIONS FROM LONG HAUL COVID PURSUANT TO LR 7.1**

NOW COME the Plaintiffs, by and through their legal counsel, Valerie A. Moran,
and hereby makes the following motion:

1. Plaintiff makes this request for Second adjournment due to continued illness and a relapse in Long Haul Covid Symptoms. Plaintiff Counsel saw her primary care doctor on June 9, 2025 and was ordered to report to the hospital for X rays and possible admission. She was released from the hospital on the evening of June 10, 2025 and ordered to see a specialist asap. Said appointment is scheduled for June 19, 2025.

2. Plaintiff Counsel now seeks an adjournment so that she can obtain additional counsel to cover this matter due to the relapse in her condition and additional medical order to treat with a specialist requiring an additional absence from work. Medical records will be emailed to opposing counsel and court staff and are not included herein for privacy reasons.
3. Plaintiff counsel previously sought stipulation from opposing counsel via email on 5/27/25 for the first adjournment and it was denied with the indication that no requests would be granted.

BRIEF IN SUPPORT

Plaintiff counsel respectfully relies upon all applicable rules and statutes and case law and LR 7.1.

WHEREFORE, Plaintiff respectfully requests that this Honorable Court permit a second adjournment so that additional counsel can be obtained as Plaintiff counsel is being ordered off of work until at least 6/19/25 and grant any other relief deemed appropriate by this Honorable Court.

Respectfully submitted,

By: Valerie A. Moran (P 56498)
Valerie A. Moran (P 56498)
Attorney for Plaintiffs
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June 10, 2025

CERTIFICATE OF SERVICE

The undersigned states under penalty of perjury that she did serve the Motion to Request Extension of time to Defendant Counsel via the filing system on 6/10/25.

By: /s/ Valerie A. Moran